

ALO--WWID-WIPP-1998-0001

Final Report

Occurrence Report

Waste Isolation Pilot Plant

(Name of Facility)

Nuclear Waste Operations/Disposal

(Facility Function)

Carlsbad Area Office

Westinghouse Waste Isolation Div.

(Laboratory, Site, or Organization)

Name: xxxxxxxxxxx**Title:** Facility Manager Designee**Telephone No.:** (505)xxxxxxxx

(Facility Manager/Designee)

Name: xxxxxxxxxxx**Title:** LMA COORDINATOR**Telephone No.:** (505) xxxxxxxx

(Originator/Transmitter)

Name:**Date:**

(Authorized Classifier (AC))

1. Occurrence Report Number: ALO--WWID-WIPP-1998-0001

NM State letter of violation No. NM489139088

2. Report Type and Date: Final

	Date	Time
Notification:	02/11/1998	12:58 (MTZ)
Initial Update:	02/27/1998	09:16 (MTZ)
Latest Update:	02/27/1998	09:16 (MTZ)
Final:	03/06/1998	10:56 (MTZ)

3. Occurrence Category: Off-Normal**4. Number of Occurrences:** 1**Original OR:**

5. Division or Project: WID/WIPP**6. Secretarial Office:** EM - Environmental Management**7. System, Bldg., or Equipment:** N/A**8. UCNI?:** No**9. Plant Area:** Balance of Plant**10. Date and Time Discovered:** 02/10/1998 15:00 (MTZ)**11. Date and Time Categorized:** 02/10/1998 16:15 (MTZ)**12. DOE Notification:**

Date	Time	Person Notified	Organization
02/11/1998	14:00 (MTZ)	xxxxxxxxxx	CAO-FR

13. Other Notifications:**14. Subject or Title of Occurrence:**

NM State letter of violation No. NM489139088

15. Nature of Occurrence:

02) Environmental
E. Environmental Agreement/Compliance Activities

16. Description of Occurrence:

On February 10, 1998, a Letter of Violation was received from the State of New Mexico informing WIPP that it had violated the New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1). Specifically, that one of the site personnel had failed to obtain his Hazardous Waste Worker refresher training within the required annual period. This is a violation of 20 NMAC 4.1.300 which incorporates federal regulation 40CFR 262.34(a)(4). This issue was discovered by the State during an inspection on November 4, 1997.

17. Operating Conditions of Facility at Time of Occurrence:

Does not apply

18. Activity Category:

10 - Inspection/Monitoring

19. Immediate Actions Taken and Results:

At the time the letter from the state was received, the individual had completed his requalification which put the WIPP site back into compliance with 20 NMAC 4.1.

20. Direct Cause:

- 3) Personnel Error
 - C. Communication Problem

21. Contributing Cause(s):**22. Root Cause:**

- 6) Management Problem
 - E. Policy Not Adequately Defined, Disseminated, or Enforced
-

23. Description of Cause:

Even though notified of the required requalification date, the involved employee did not attend refresher training as originally scheduled. The employee's supervisor had temporarily assigned the employee to other high priority duties which did not involve hazardous waste handling. Neither the employee nor the supervisor fully appreciated the priority senior management places on keeping hazardous waste worker training and qualifications current.

24. Evaluation (by Facility Manager/Designee):

This issue was discovered by the State during an inspection on November 4, 1997. This inspection included a review of training records for Hazardous Waste Workers (HWW). The person whose qualifications had temporarily

lapsed had completed initial HWW training on April 9, 1996. Annual refresher training was required to be completed on or before April 9, 1997. Due to scheduling conflicts, this employee did not complete his refresher training until May 2, 1997.

A review of operating logs confirmed the employee had not been involved in any activities involving hazardous waste handling during the 23 day period while his qualification was not current.

This condition had been recognized and corrected in May of 1997, long before the NMED inspection on November 4, 1997. Several administrative processes were changed to enhance notifications of mandatory training and tracking of personnel changes that impact those job assignments where unique training is required. Management attention was also directed to the high priority placed on ensuring worker qualifications are current.

25. Is Further Evaluation Required?: No

26. Corrective Actions

(* = Date added/revised since final report was approved.)

1. A formal letter of response was sent the New Mexico State Environmental Department within the 15 days allowed by NMED.

Target Completion Date: 02/26/1998

Completion Date: 02/26/1998

27. Impact on Environment, Safety and Health:

None

28. Programmatic Impact:

None

29. Impact on Codes and Standards:

None

30. Lessons Learned:

A higher degree of employee and management attention has been directed to the general area of maintaining job qualification through timely refresher training and/or required requalification.

31. Similar Occurrence Report Numbers:

1. None

32. User-defined Field #1:**33. User-defined Field #2:**

34. DOE Facility Representative Input:

35. DOE Program Manager Input:

36. Approvals:

Approved by: xxxxxxxxxxx, Facility Manager/Designee

Date: 02/27/1998

Telephone No.: (505) xxxxxxxx

Approved by: xxxxxxxxxxx, Facility Representative/Designee

Date: xxxxxxxx

Telephone No.:

Approved by: Approval delegated to FR

Date: 03/06/1998

Telephone No.:
